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22 *Experian Information Solutions, Inc.*

23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 EDWARD CALVILLO,

26 Plaintiff,

27 v.

28 EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

Case No. 2:19-CV-00277-RFB-NJK

**DEFENDANT EXPERIAN INFORMATION
SOLUTIONS, INC. AND PLAINTIFF
EDWARD CALVILLO'S STIPULATION
TO EXTEND TIME TO FILE DISCOVERY
PLAN**

[First Request]

Complaint filed: February 14, 2019

FAC filed: April 16, 2019

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30 Defendant Experian Information Solutions, Inc. ("Experian"), by and through its counsel
31 of record, and Plaintiff Edward Calvillo ("Plaintiff"), by and through his counsel of record, hereby
32 submit this stipulation to extend the time to file a discovery plan. The parties stipulate as follow:
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1 1. On April 1, 2020, the Court entered an order granting in part and denying in part
2 Experian's motion to dismiss, among other rulings. The Court also granted Plaintiff leave to
3 amend certain claims. (ECF No. 64, hereinafter "the Order").

4 2. The Court ordered that Plaintiff shall have until April 15, 2020, to file a second-
5 amended complaint should Plaintiff elect to do so. (*Id.*).

6 3. The Court previously ordered discovery stayed until resolution of that motion to
7 dismiss. (ECF No. 54).

8 4. The Court previously ordered that a discovery plan shall be due 14 days after
9 resolution of Experian's motion to dismiss should the resolution of that motion not result in
10 termination of the case. (*Id.*). As such, the joint discovery plan is due April 15, 2020.

11 5. In light of the impact of COVID-19 and the parties and counsel's respective stay at
12 home orders, it has become increasingly difficult to obtain the necessary input to have a fulsome
13 Rule 26 discussion and enter into a joint discovery plan by April 15, 2020.

14 6. Additionally, with Plaintiff's second amended complaint being due April 15, 2020,
15 the parties would like an opportunity to consider that second amended complaint in preparing a
16 joint discovery plan.

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1 7. As such, the parties stipulate and agree that the joint discovery plan shall be due
2 April 29, 2020.

3 **IT IS SO STIPULATED.**

4 DATED this 14th day of April, 2020.

5 NAYLOR & BRASTER

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25 *Attorneys for Plaintiff Edward Calvillo*

26 **IT IS SO ORDERED.**

27 Dated: April 15, 2020

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29 UNITED STATES MAGISTRATE JUDGE